



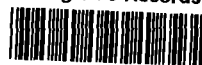
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

Dion

REPLY TO THE ATTENTION OF

August 16, 2004

EPA Region 5 Records Ctr.



362867

William M. Baran, Mayor  
City of Hillsboro  
447 S. Main St.  
P.O. Box 556  
Hillsboro, IL 62049-0556

Re: Proposed Redevelopment Plans-Eagle Zinc property

Dear Mayor Baran:

I have received and reviewed your letter dated July 7, 2004, in which the City of Hillsboro asks that two portions of the former Eagle Zinc property be released for future use. In your letter, you provide several maps showing where the City hopes to construct a wastewater treatment plant and where the City hopes to utilize an existing rail spur with a road constructed through the property so that Hixon Lumber can expand its operations onto the southern portion of the Eagle Zinc property.

Because these two projects involve property that is part of the Eagle Zinc site, EPA has a responsibility to make sure that redevelopment does not create environmental hazards and is consistent with the final cleanup approach for the Site. As we discussed at the July 6, 2004 meeting at your office, EPA needs additional details from the City so that EPA can evaluate whether these potential uses would have an impact on human health and the environment. With this information, EPA can work with the City to try to help the redevelopment move forward. As we have discussed, any redevelopment plans also require the cooperation of the current property owner and the site PRP group, who also have interest in avoiding any new environmental impacts at the Site.

As you recall, the City has previously approached the EPA about using the northwestern area of the Eagle Zinc property to locate the City's proposed new wastewater treatment plant. This was the subject of a meeting between EPA, the City, the City's consultant and the site owner on September 11, 2003. John Ix authored a letter dated September 26, 2003, in which he provided a summary of the issues discussed at the meeting. This letter also outlined various tasks discussed and decided at this meeting. You were originally copied on this letter but for your convenience, I have attached a copy to this letter.

The tasks outlined in this letter are necessary to more fully evaluate this treatment plant proposal and EPA looks forward to receiving this information so that we may continue our previous discussions. Has the City had any subsequent conversations with the site PRP group about gathering the information outlined in the attached letter?

The Superfund Remedial Investigation/Feasibility Study sampling in the northwest corner of the Eagle Zinc Site was not designed to help locate a treatment plant; the long term assumption was that this area would remain undeveloped. The three samples collected in that area were only collected to depths of 4 feet and XRF sampling results from surficial samples showed minor amounts of inorganic contamination, however, this information is not sufficient to determine whether construction of and operation of a treatment plant in that area could present environmental concerns. The issues summarized in the Ix letter will help EPA make this determination in a timely manner.

The Hixon Lumber proposal is new, and there is more site contaminant information available in the area where this development is proposed. It may be possible to develop this area in a way that protects human health and the environment and is consistent with the overall cleanup approach for the Site.

The map showing the general outlines of the roadway as it connects with the existing rail spur is a good start, but EPA needs the additional information outlined in the July 6 meeting. In particular, EPA needs construction details for the proposed roadway, especially concerning any elements of the work that may disturb soil. EPA also requested that the City provide a description of uses for this road, including materials, and a timeframe for usage. Will any area of the Eagle Zinc Site be used for storage of Hixon Lumber materials, either temporarily or permanently?

This information is critical for EPA to work with the City to evaluate potential risks, and to determine how best to minimize those risks and to integrate this project with future remedy activities for the entire Site.

Samples from the immediate area of the proposed roadbed (it would be helpful to project the proposed roadway onto an existing Environ figure illustrating soil concentrations) contain varying levels of inorganic compounds. Risk evaluations for protection of human health and the environment are currently being finalized and are scheduled to be delivered to the Agency in late


August with EPA review completed in September. EPA intends to use the risk evaluations to help select the most appropriate remedy at the site and also to evaluate reuse proposals such as this roadway project.

Please provide this requested information as soon as possible so that EPA may assist you in further evaluation of these proposals. EPA pledges to work with you once it has this information to try to coordinate our shared goals of environmental protection and successful redevelopment.

EPA may also have redevelopment resources that could be available to help the City with site redevelopment. I have made some initial progress towards this end and will let you know shortly the extent of the assistance that I will be able to offer.

If you have any questions, please contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Dion Novak".

Dion Novak  
Remedial Project Manager

Attachment

cc: R. Lanham, IEPA  
C. English, CH2M Hill  
T. Krueger, EPA  
J. Ix. Dechert  
R. Jones, Environ  
US Rep J. Shimkus-attn. Deb Detmers  
Sen Dick Durbin-attn. Bill Houlihan  
US Rep Lane Evans-attn. Pat Dawson  
M. Canavan, EPA  
M. Mankowski, EPA



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 Direct Fax: 215.655.2995  
 john.ix@dechert.com

# MEMORANDUM

## VIA FACSIMILE

DATE: September 26, 2003

BOSTON

TO: Mr. Dion Novak  
 Thomas Krueger, Esq.  
 Hon. William Baran  
 Douglas Jarman, Esq.  
 Mr. Ross Jones  
 Mr. Scott Hunt  
 Frank McCune, Esq.  
 Eugene Smary, Esq.

BRUSSELS

FRANKFURT

HARRISBURG

HARTFORD

LONDON

CC: Lois Kimbol, Esq.  
 Mr. Dean Bangor  
 Donald McConnell, Esq.

LUXEMBOURG

NEW YORK

FROM: John M. Ix *JMI*

NEWPORT BEACH

RE: September 11<sup>th</sup> Meeting

PALO ALTO

Thank you for your participation in the meetings held on September 11, 2003. We think significant progress was made in outlining the tasks necessary to accomplish a transfer of the subject 10-acre tract to the City of Hillsboro. For our mutual benefit, I have outlined those tasks below.

PARIS

PHILADELPHIA

Ross Jones

PRINCETON

1. Provide depth to groundwater data to Scott Hunt;

SAN FRANCISCO

2. Confirm to Scott Hunt that he should run all priority metals;

WASHINGTON

2. Contact Tom Gooding, Chairman of City of Hillsboro Planning Committee to obtain future site use information to be used in the risk assessment process;

3. Prepare proposal for Dion Novak what, if any, additional samples are required for the 10 acre site to obtain EPA/IDEM "No Further Action" approval; and

4. Develop cost estimate for additional sampling, if any.

Mayor Baran

1. Arrange for conversations between Ross Jones and USEPA (if requested) and Tom Gooding of the Planning Commission to provide future site use information; and

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4000 Bell Atlantic Tower • 1717 Arch Street • Philadelphia, PA 19103-2783 • Tel: 215.994.4000 • Fax: 215.994.2222 • www.dechert.com

2. *Provide historical site use information to Ross Jones, for use by Ross in identifying what, if any, additional samples are required for the 10 acre site to obtain EPA/IDEM "No Further Action" approval.*

Scott Hunt

1. *Identify for Ross Jones the proposed depth of excavation for construction of the water treatment plant, so that Ross can identify what, if any, additional samples will be necessary to obtain EPA/IDEM "No Further Action" approval.*
2. *Sample the water treatment plant effluent for the metals COCs identified by Ross Jones and communicate results to Ross Jones; and*
3. *Prepare a site schematic for Dion Novak and Ross Jones.*

Dechert

1. *Prepare draft agreement for transfer of property;*
2. *Confer with PRPs concerning proposed acquisition of 10 acre site by City of Hillsboro; and*
3. *Follow-up with EPA contact concerning potential Brownfields financing assistance.*